

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JANE DOE 1 and JANE DOE 2, :  
: Plaintiff,  
: Case No. 1:19-cv-07675-GBD-DCF  
v. :  
ESTATE OF JEFFREY EPSTEIN; SUE ROE; :  
and ROES 2-10, :  
: Defendants.  
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**NOTICE OF DEFENDANTS CO-EXECUTORS' MOTION TO DISMISS  
PLAINTIFFS' COMPLAINT**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Declaration of Bennet J. Moskowitz dated December 6, 2019 and the exhibit thereto, and all prior pleadings and proceedings in this action, Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein (incorrectly named herein as "Estate of Jeffrey Epstein"), will move this Court before the Hon. George B. Daniels, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., New York, New York 10007, on January 10, 2020 at 10:00 a.m., or as soon thereafter as counsel may be heard, for an Order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing Plaintiffs Jane Doe 1 and Jane Doe 2's Complaint (Doc. # 5) with prejudice for failure to state a claim; and for such other and further relief as may be just and proper.

Dated: New York, New York  
December 6, 2019

Respectfully submitted,

TROUTMAN SANDERS LLP  
875 Third Avenue  
New York, New York 10022

By: /s/ Bennet J. Moskowitz  
Bennet J. Moskowitz

*Attorneys for Defendants Darren K. Indyke and  
Richard D. Kahn, Co-Executors of the Estate of  
Jeffrey E. Epstein*